

Mutagenicity:

B.4.1 Evaluation of AD 32 in the Ames Assay with E. Coli (sic). 1996. Study 3-D22. Vol 1.23, page 55.

Drug	AD 32, (OLI-222) Lot 002.
Bacteria	S. typhimurium TA98, TA100, TA1535, TA1537 all with rfa mutation E. coli WP2 uvr A, WP2 uvr A with pKM101.
Solvent	DMSO
Dose	in a range finding study and in confirmatory assay 0.050 mg/plate to 5 mg/plate.
Positive Cntl.	2-aminoanthracene with S9 2-nitrofluorene (TA98) Sodium azide (TA100 and TA1535) 9-aminoacridine (TA1537) ENNG (WP2 uvr A both strains)
Metabolic Act.	S9 from Aroclor 1254 induced Sprague-Dawley rats.

This study was done by

signed the GLP statement.

I do not consider Aroclor 1254 the best inducer of S9 for this experiment. It primarily induces CYP 1A1 in the rat. Human liver does not express this isoform in large concentrations. Nevertheless, in this experiment this problem is irrelevant because AD 32 was strongly mutagenic with and without S9. The following table shows that AD 32 caused an increase in the mean number of revertants per plate in two Salmonella strains, TA98, TA100, and one E. coli strain, WP2 uvrA with pKM101. All three of these bacterial strains contained the pKM101 plasmid. This plasmid increases the sensitivity of the bacteria to mutations involving error prone repair. AD 32 did not cause and increase in the number of mutations in the three strains that did not contain this plasmid. This implies that mutations caused by AD 32 involve repair mechanisms. Metabolic activation increased the frequency of mutations in strain TA98, and perhaps TA100. Activation seemed to decrease the frequency of mutations in the E. coli strain.

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	S9	TA98 pKM101	TA100 pKM101	TA1535	TA1537	WP2uvr A	WP2uvr A pKM101
Negative Control	(-)	16	110	22	13	52	80
	(+)	23	121	17	11	74	75
Positive Control	(-)	737	660	347	473	195	355
	(+)	2271	2874	435	458	450	1624
AD 32 mg/plate							
5	(-)	564	346	16	11	54	161
1.5	(-)	386	288	20	11	49	133
0.5	(-)	299	273	18	10	47	107
0.15	(-)	131	1899	25	13	52	85
0.05	(-)	39	141	22	11	55	61
5	(+)	857	356	14	13	66	117
1.5	(+)	785	338	15	14	62	104
0.5	(+)	315	297	16	20	64	103
0.15	(+)	154	288	18	19	72	101
0.05	(+)	78	227	17	17	64	90

The compound precipitated at 1.5 and 5 mg/plate. Thus, the dose response may diminish at these concentrations or above. The lowest concentration tested, 0.05 mg/plate, is somewhat higher than the usual low concentration in an Ames assay. This low concentration shows a positive response in TA98 and TA100. This experiment would be more informative if the investigators had extended their concentration series a log lower.

B.4.2. Evaluation of AD 32 in the *in vitro* chromosomal aberration assay. Study 3-D23. 1997, Vol 1.23, p 98.

Drug AD 32, (OLI-222) Lot 002.
Cells Chinese hamster ovary (CHO).
Solvent DMSO
Dose 0.075 to 75 µg/plate activated range finding assay
0.25 to 2500 µg/plate non-activated range finding assay
0.25 to 2.5 µg/plate non-activated confirmatory assay
Exposure time 3 hr
growth time 18 hr
Positive Cntl. Mitomycin C without S9
Cyclophosphamide with S9
Metabolic Act. S9 from Aroclor 1254 induced Sprague-Dawley rats.

This study was done by

signed the GLP statement.

The following table shows that AD 32 causes even more chromosomal damage than the positive control, mitomycin C, without metabolic activation. The addition of metabolic activation does not greatly increase this damage. The concentrations that cause aberrations (ABS) are relatively low, 0.75 µg/ml or 1 µM. The authors of this study say that the compound

caused a variety of complex damage including interstitial deletion, triradial, quadriradial, dicentric ring, and complex rearrangement. AD 32 is clastogenic to mammalian cells *in vitro*.

	Dose µg/ml	No. Cells Analyzed	Metabolic Activation Gaps Excluded			Metabolic Activation Gaps Excluded		
			Total No. ABS	Mean ABS/cell	% Cells With ABS	Total No. ABS	Mean ABS/cell	% Cells With ABS
Positive Control								
Cyclophosphamide	25	25	85	3.4	92			
		25	82	3.28	92			
Mitomycin C		25				53	2.12	76
		25				40	1.6	60
Negative Control								
DMSO	1%	100	2	0.02	2	2	0.02	2
		100	1	0.01	1	1	0.01	1
AD 32	0.25	100	2	0.02	2	3	0.03	3
		100	1	0.01	1	3	0.03	3
	0.75	100	6	0.06	4	45	0.45	27
		100	11	0.11	10	27	0.27	20
	2.5	25	161	6.44	96	173	6.92	96
		25	107	4.28	76	158	6.32	100

Mutagenicity Summary

AD 32 caused increases in the number of bacterial revertants as high as 17 fold above control in two strains of *Salmonella* and one strain of *E. coli* without S9 activation. With S9, AD 32 caused increases in the number of revertants as high as 53 fold. The strains that were sensitive all contained the pKM101 plasmid suggesting that AD 32 causes mutations involving error prone repair. In *in vitro* chromosomal aberration assays, AD 32 caused even more chromosomal damage than the positive control, mitomycin C, without S9. At the higher concentrations the incidence of damage was more than 300 fold greater than control. Adding S9 did not significantly increase this damage. Clearly, AD 32 is mutagenic.

Reproductive toxicity

D. 1. Intravenous developmental toxicity study of AD 32 in Rats. Study 2901-001.

Submission BP, received March 26, 1998.

Animals	Crl:CD Sprague-Dawley female Rats
Drug	AD32 Sterile Liquid, lot BVL 515-44-0003
Vehicle	NCI Diluent 12 in 0.9% NaCl
Doses	0, 36, 72, 144 mg/m ² (given as 0, 6, 12 and 24 mg/kg)
Concentrations	0, 6, 12 and 24 mg/ml
Route	IV
Schedule	daily on gestation days 7 through 17
N	25 per dose group, plus a satellite group with 2 in the control and 6 in the test.
Observations	
Clin. Obs.	Daily
Food Cons.	d0, 7, 10, 12, 15, 18, and 20
Body Wt.	daily
Blood	d7 before and after dosing in 3 dosed satellite rats these rats were killed 4 hr after dosing. D17 before and after dosing in 3 dosed satellite rats and all fetuses these rats were killed 4 hr after dosing.
Necropsy	D20
	~ half of the fetuses in each litter were examined for soft tissue alterations
	~ half of the fetuses in each litter were examined for skeletal alterations

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signed the GLP statement.

Results

Mortality	No deaths, abortions or premature deliveries occurred during the study.
Clinical Obs.	None associated with AD 32 dosing
Body Wt.	Dose dependent decrease in mid and high dose group animals independent of fetal resorption. (to 11% decrease relative to control in HD at day 20)
Food Cons.	Consistent with body weight decrease.
Caesarean Section Results	

	Control			6 mg/kg			12 mg/kg			24 mg/kg		
	N	mean/litter	SD	N	mean/litter	SD	N	mean/litter	SD	N	mean/litter	SD
Number of Rats tested	25			25			25			25		
Corpora Lutea		16.2	2		16	1.9		17	3.1		15.9	2.4
Implantations		15.1	1.1		14.9	1.2		15.4	2.5		14.7	1.8
Litter Sizes		14.5	1.5		14.5	1.3		15.2	2.7		9.8*	6.3
Live Fetuses	333	14.5	1.5	333	14.5	1.3	364	15.2	2.7	244	9.8*	6.3
Dead Fetuses	0			0			0			0		
Resorptions		0.6	0.8		0.4	0.6		0.2	0.5		4.9	6.2
Early Resorptions	15	0.6	0.8	9	0.4	0.6	5	0.2	0.5	111	4.4	6.2
Late Resorptions	0			0			0			12	0.5	1.2
Pregnant	23	Percentage 92		23	Percentage 92		24	Percentage 96		25	Percentage 100	
Dams with any resorptions	11	47.8		8	34.8		4	16.7		15	60	
Dams with all conceptuses resorbed	0			0			0			6	24**	
Dams with viable fetuses	23	100		23	100		24	100		19	76**	
Placentae appeared normal	23	100		23	100		24	100		19	100	

* $p \leq 0.05$

** $p \leq 0.01$

Incidence of any Fetal Alterations

	Control		6 mg/kg		12 mg/kg		24 mg/kg	
Litters Evaluated	23		23		24		19	
Fetuses Evaluated	333		333		364		244	
Live	333		333		364		244	
Litters with fetuses with any alteration N and %	8	34.8	10	43.5	16*	66.7	18**	94.7
Fetuses with any alteration N and %	10	3	12	3.6	58	15.9	113**	46.3
% fetuses with any alteration per liter, mean and SD	2.8	4.2	3.5	4.5	15.7**	17.2	52.5**	37.7

* $p \leq 0.05$

** $p \leq 0.01$

Malformations

The 12 and 24 mg/kg/d dose groups had dose-dependent increases in litter and fetal incidences of depressed eye bulges, short snout and tail malformations. The litter and fetal incidences of depressed eye bulges and short snout were significant in the 24 mg/kg/d group. Additional increased incidences of external malformations in the HD group included head malformations (meningocele, cleft snout with associated cleft palate, protrusion of the tongue, dilation of the ventricles of the brain), edematous body and umbilical hernia. The following table shows the litter and fetal incidence of some of these malformations that reached statistical significance (** $p \leq 0.01$).

DOSAGE GROUP		I	II	III	IV
DOSAGE (MG/KG/DAY) _a		control	6	12	24
LITTERS EVALUATED	N	23	23	24	19
FETUSES EVALUATED	N	161	160	177	118
LIVE	N	161	160	177	118
PALATE: CLEFT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (1.7)**
EYES: MICROPTHALMIA					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	4 (16.7)	11 (57.9)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	10 (5.6)	33 (28)
BRAIN: LATERAL VENTRICLES, MODERATE DILATION					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	1 (4.2)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	1 (0.6)	6 (5.1)**
BRAIN: LATERAL VENTRICLES, MARKED DILATION					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	4 (16.7)	9 (47.4)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	5 (2.8)	20 (16.9)**
BRAIN: THIRD VENTRICLE, MODERATE DILATION					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	1 (4.2)	7 (36.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	2 (1.1)	12 (10.2)**
BRAIN: THIRD VENTRICLE, MARKED DILATION					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	4 (21)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	7 (5.9)**
BRAIN: THIRD VENTRICLE, SLIGHT DILATION					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	4 (16.7)	2 (10.5)*
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	4 (2.2)	7 (4.2)**
BRAIN: LATERAL VENTRICLES, EXTREME DILATION					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)

Skeletal Alterations

Skeletal alterations were numerous and dose related. In the skull the incidence of small eye socket was associated with microphthalmia seen above. Small nasal turbanates, premaxillae and maxillae or incompletely ossified sphenoid was associated with short snout. In the cervical vertebrae, the incidences of fused arches or small arches or both increased in the mid and high dose groups. The incidence of fused ribs was significant in the mid and high dose groups. The high dose group had additional rib malformations including segmentation or absence of the rib or the rib base, reduced rib number and broadening of the ribs. In this group there was also an increase in the incidence of "scrambling" of the thoracic vertebral elements (bifid, not ossified, unilaterally ossified or irregularly shaped or fused centra, fused arches, small arches, or hemivertebra). In the lumbar region the high dose group showed an increase in bifid centra.

Variations of the cervical vertebrae included the presence of cervical ribs at the 7th cervical vertebra in the mid and high dose groups. Delayed and incomplete ossification of the sternum was significant in the high dose group. The following table shows the litter and fetal incidence of all the alterations and variations that reached statistical significance and some that did not.

PROTOCOL 2901-001: INTRAVENOUS DEVELOPMENTAL TOXICITY STUDY OF AD 32 IN RATS

TABLE 11 (PAGE 1): FETAL SKELETAL ALTERATIONS -

SUMMARY

(See footnotes on the last page of this table.)

DOSAGE GROUP		I	II	III	IV
DOSAGE (MG/KG/DAY)		control	6	12	24
LITTERS EVALUATED	N	23	23	24	19
FETUSES EVALUATED	N	172	173	187	126
LIVE	N	172	173	187	126
SKULL: NASALS, SMALL					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	1 (4.2)	4 (21.0)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	1 (0.5)	9 (7.1)**
SKULL: MAXILLAE, SMALL					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	1 (4.2)	4 (21.0)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	1 (0.5)	9 (7.1)**
SKULL: PREMAXILLAE, SMALL					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	1 (4.2)	4 (21.0)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	1 (0.5)	9 (7.1)**
SKULL: EYE SOCKET, SMALL					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	2 (8.3)	12 (63.2)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	4 (2.1)	45 (35.7)**
SKULL: SPHENOID, INCOMPLETELY OSSIFIED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	4 (3.2)**
SKULL: ANTERIOR FONTANELLE, LARGE					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)
SKULL: PALATE, INCOMPLETELY OSSIFIED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)
CERVICAL VERTEBRAE: CERVICAL RIB PRESENT AT 7TH CERVICAL VERTEBRA					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	12 (50.0) **	12 (63.2)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	23 (12.3)**	22 (17.5)**
CERVICAL VERTEBRAE: ARCHES, FUSED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	1 (4.2)	9 (47.4)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	1 (0.5)	19 (15.1)**
CERVICAL VERTEBRAE: ARCH, SMALL					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	1 (4.2)	9 (47.4)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	1 (0.5)	14 (11.1)
CERVICAL VERTEBRAE: ARCH, NOT OSSIFIED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	7 (36.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	16 (12.7)**
CERVICAL VERTEBRAE: 6 PRESENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)
CERVICAL VERTEBRAE: IRREGULARLY SHAPED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)

DOSAGE GROUP		I	II	III	IV
DOSAGE (MG/KG/DAY) ^a		control	6	12	24
LITTERS EVALUATED	N	23	23	24	19
FETUSES EVALUATED	N	172	173	187	126
LIVE	N	172	173	187	126
THORACIC VERTEBRAE: CENTRUM, BIFID					
	LITTER INCIDENCE	2 (8.7)	2 (8.7)	6 (25)	12 (63.2)**
	FETAL INCIDENCE	2 (1.2)	2 (1.2)	8 (4.3)	22 (17.5)**
THORACIC VERTEBRAE: CENTRUM, UNILATERAL OSSIFICATION					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	7 (36.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	14 (11.1)**
THORACIC VERTEBRAE: CENTRA, FUSED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (2.4)**
THORACIC VERTEBRAE: ARCHES, FUSED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	5 (26.3)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	6 (4.8)**
THORACIC VERTEBRAE: ARCH, SMALL					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	4 (3.2)**
THORACIC VERTEBRAE: CENTRUM, NOT OSSIFIED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	4 (3.2)**
THORACIC VERTEBRAE: HEMIVERTEBRA					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (2.4)**
THORACIC VERTEBRAE: 11 PRESENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)
THORACIC VERTEBRAE: 12 PRESENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (10.5)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (2.4)**
LUMBAR VERTEBRAE: CENTRUM, BIFID					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	4 (3.2)**
RIBS: FUSED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	7 (36.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	16 (12.7)**
RIBS: TWO SEGMENTS					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (10.5)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (1.6)**
RIBS: ABSENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)
RIBS: 11 PRESENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (1.6)**
RIBS: BROAD					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	4 (3.2)**

DOSAGE GROUP		I	II	III	IV
DOSAGE (MG/KG/DAY) ^a		control	6	12	24
LITTERS EVALUATED	N	23	23	24	19
FETUSES EVALUATED	N	172	173	187	126
LIVE	N	172	173	187	126
RIBS: BASE ABSENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (15.8)**
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	4 (3.2)**
RIBS: 12 PRESENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (10.5)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	3 (2.4)**
RIBS: 10 PRESENT					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)
MANUBRIUM: MISALIGNED					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (5.3)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	1 (0.8)
STERNAL CENTRA SUMMARIZATION (includes incompletely ossified, not ossified, fused and asymmetric sternal centra)					
	LITTER INCIDENCE	5 (21.7)	2 (8.7)	6 (25.0)	12 (63.2)**
	FETAL INCIDENCE	5 (2.9)	3 (1.7)	12 (6.4)	26 (20.6)**
STERNAL CENTRA: 1ST, NOT OSSIFIED					
	LITTER INCIDENCE	2 (8.7)	1 (4.3)	3 (12.5)	8 (42.1)**
	FETAL INCIDENCE	2 (1.2)	1 (0.6)	6 (3.2)	16 (12.7)**
STERNAL CENTRA: 1ST, INCOMPLETELY OSSIFIED					
	LITTER INCIDENCE	3 (13.0)	2 (8.7)	5 (20.8)	9 (47.4)**
	FETAL INCIDENCE	3 (1.7)	2 (1.2)	6 (3.2)	9 (7.1)**
STERNAL CENTRA: ASYMMETRIC					
	LITTER INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (10.5)
	FETAL INCIDENCE	0 (0.0)	0 (0.0)	0 (0.0)	2 (1.6)**

In conclusion, the maternal NOAEL of AD 32 is less than 6 mg/kg/d since rats in all dose groups lost weight. Thus all doses in this experiment caused maternal toxicity. Likewise, 6 mg/kg/d was not a fetal NOAEL, all dose levels caused fetal body weight reduction. Higher doses, 12 and 24 mg/kg/d, caused embryo-fetal death and numerous fetal malformations and variations, particularly in the skeletons of the fetal mice.

Pharmacokinetics and Toxicokinetics:

- C.2. M Israel and VK Khetarpal, 1991. Comparative tissue distribution and metabolism studies with Dox and AD 32 in normal and tumor bearing mice. Vol. 1.24, page 300.

did this impressively large and comprehensive study to compare the metabolism and distribution of AD 32 and Dox. They wanted to determine why AD 32 appears to have a significantly better therapeutic index in certain mouse tumor models than Dox. AD 32 causes less acute toxicity and less cumulative cardiac toxicity. AD 32 is more lipophilic than Dox. This may explain why AD 32 is cleared from the blood into tissue somewhat more quickly. In cells AD 32 appears to accumulate in the cytoplasm. The hypothesis underlying these studies was that the increased effectiveness of AD 32 resulted from this greater and more rapid

accumulation in cells followed by its enzymatic conversion to Dox. That is, is AD 32 a well distributed Dox prodrug?

The authors gave male A/JAX mice 50 mg/kg AD 32 or 4 mg/kg Dox IV tail vein. They killed five animals at each time point (15 and 30 min, 1, 2, 4, 6, 8, 12, 16, and 24 hr after treatment) and took tissue samples. They homogenized and extracted the tissue samples and quantitated the anthracycline concentrations by with fluorescence detection. In similar experiments they examined tissues from mice with tumor implants and mice given four daily doses of anthracycline.

After a single dose, AD 32 disappeared rapidly from the serum and from most tissues. This was due to rapid hydrolysis to AD 41. AD 92 was also detected in all tissues, but the highest concentrations occurred in the small intestine (with contents). The authors detected and characterized two previously unrecognized aglycone metabolites, AD 151 in most tissues, and AD 112 in the liver and kidney. Dox was detected as a minor metabolite.

A single dose of Dox was also rapidly cleared from serum. Nevertheless, in this case the parent compound was little metabolized. AMNOL (dihydroadriamycin), adriamycinone, AD151 and AD 112 were minor metabolites. Dox tissue concentrations were 3 to 8 times less in AD 32 treated mice than in Dox treated animals.

Daily treatment for four days with AD 32 and Dox caused accumulation of Dox in tissues, but Dox concentrations in AD 32 treated mice were still 3-8 fold lower than those in Dox treated mice. In tumor bearing mice, Dox concentrations were also lower in AD 32 treated animals than in Dox treated animals. Again in this study as in others, AD 32 was more effective against tumor implants than AD 32 at toxicologically equivalent doses. These results suggest that AD 32 is not a simple pro-drug of Dox and that the differences in its cytotoxicity, and hence its anti-tumor activity, are related to the presence of the N-trifluoroacetyl group.

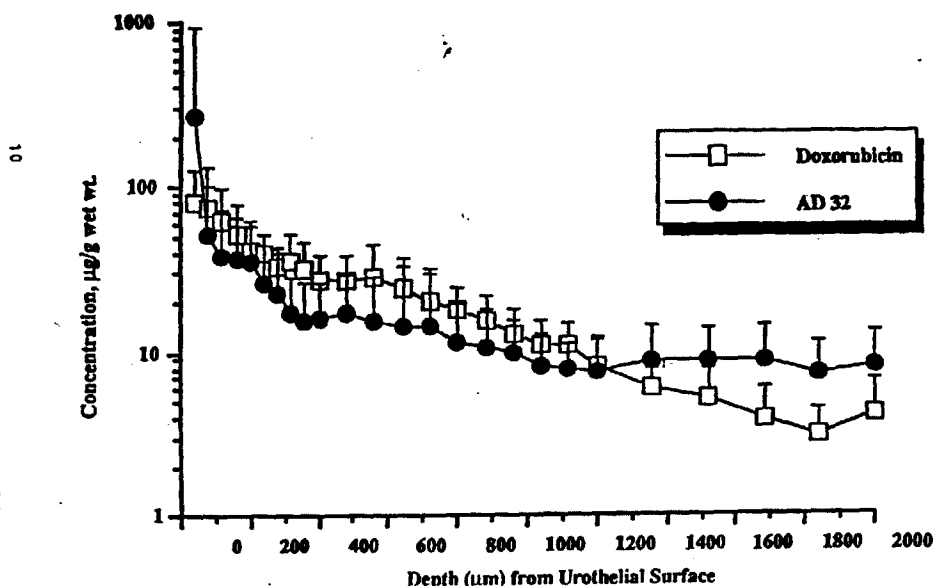
C.4. TW Sweatman. N-trifluoroacetyladiamycin-14-valerate (AD32): Drug penetration of the dog urinary bladder following intravesical instillation, 1992. Volume 1.12, page 086. This report is identical to study A.2. Vol. 12, p 218.

Sweatman instilled AD 32 (400 mg in 40 ml 25% NCI Diluent 12 plus 75% saline) or Dox (40 mg in 40 ml saline) into the urinary bladders of conscious sedated dogs. Fifteen minutes before the end of the installation he anesthetized the dogs and surgically exposed the urinary bladder. He removed the drug and accumulated urine and then excised the bladder. The bladder was immediately frozen on an aluminum block. Sequential 10 micron sections, parallel to the epithelial surface, were cut from three 2 cm X 2 cm squares of tissue, one each from the left and right lateral surfaces and one from the bladder dome. Three dogs were used for each chemical. The anthracyclines were then extracted from groups of the sections. The concentration of each anthracycline was determined in the samples by

The following graph shows the results of this experiment. The text does not clearly state that the concentrations in the graph are those of AD 32 or of AD 32 and its metabolites. My impression is that it is the latter. My comments are based on that assumption. The text does imply that the technique quantified AD 41 in the samples. Dox had no metabolites under these conditions.

Figure 3.

Mean Anthracycline Penetration (Left + Right Lateral + Dome) of the Dog Urinary Bladder Following Intravesical N-Trifluoroacetyl Adriamycin-14-valerate (AD 32: 10 mg/ml) or Doxorubicin Instillation (1.0 mg/ml)



The urinary bladder of the dog is morphologically similar to that of humans, but it is only half as thick. Nevertheless, diffusion distance is probably more a function of morphology than of thickness. The concentration of both chemicals falls steeply between the luminal surface and approximately 200 microns. T1 tumors are located in the region of the lamina propria, or about 400 microns deep in the dog. At this level the mean concentration of AD 32 was 16000 ng/g wet weight or approximately 22.1 μM assuming a specific gravity of 1. Deeper within the superficial muscle layers of the bladder wall at the level of T2 tumors (~1600 microns) the concentration of anthracycline remained essentially constant across a wide band of tissue.

Overall Summary:

AD 32 is a synthetic analog of adriamycin (Dox). The addition of a valerate ester to the 14-carbon significantly increases the lipid solubility of this compound over that of adriamycin. Thus, AD 32 crosses the cell membrane rapidly and unlike Dox, accumulates in the cytoplasm. AD 32 does not appear to intercalate with DNA. AD 32 is extensively metabolized and cleared rapidly when given to test animals or humans IV. AD 32 is fluorescent. This property allows small concentrations of the compound to be determined.

Four daily doses of 12 mg/m² (given as 4 mg/kg) of Dox and 120 to 180 mg/m² (40 to 60 mg/kg) AD 32 in tumor bearing mice are roughly equipotent against a range of tumors. At 12 mg/m² Dox is somewhat more toxic than equivalent doses of AD 32, thus AD 32 appears to have a better therapeutic index than Dox. This observation and the fact that AD 32 appears to be effective against some tumor implants resistant to Dox seems to have driven much of the research into the pharmacology of this compound.

AD 32 is not effective against intracerebral tumor implants, implying that it does not cross the BBB. *In vivo*, AD 32 is an even more potent immunosuppressant than Dox. This immunosuppression is probably the simple result of myelotoxicity. Like that of Dox, the myelotoxicity associated with AD 32 is very rapid; nadir occurs by day two of dosing.

The major metabolite of AD 32 is AD 41 in all tissues studied. Cytochrome P450 oxidizes AD 32 to more polar compounds only in very limited concentrations in the liver. Unlike Dox, AD 32 does not inhibit DNase I.

DNA added to AD 32 preparations, did not quench the fluorescence of AD 32. This suggests that the aromatic region of AD 32 does not interact directly with the DNA.

A single IP dose of 54 mg/kg (324 mg/m²) caused no adverse effects in female albino rats. A dose of 106 mg/kg (636 mg/m²) caused only mild toxicity including transient anorexia, decrease in segmented neutrophils.

When investigators instilled doses of AD-32 (54 mg/kg, 34 mg/ml) in the urinary bladder of anesthetized rats they found only mild signs of irritation. These signs were also seen in controls. The bioavailability of AD-32 after instillation in the urinary bladder of rats is < 1%. Recovery of the dose from the bladder after instillation was > 95% after 2 hr.

AD 32 did not cause corneal opacity, iritis or any unusual ocular toxicity when instilled in the eyes of rabbits. It caused only mild irritation probably associated with the vehicle. Likewise, AD 32 caused no unusual local skin irritation. AD 32 does not appear to cause the profound cumulative cardiac toxicity that Dox causes in rabbits.

The LD₁₀ for a single dose of AD 32, IV, is 46 mg/kg (95% CL 35 to 56 mg/kg) in rabbits. Single doses to 636 mg/m² (given as 106 mg/kg), IP, caused only minor toxicity in rats when the dose was removed after 4 hours. Single doses to 53 mg/kg instilled in the urinary bladder of female rats for 2 hours caused no serious toxicity and no detectable microscopic damage to the bladder. Single intrathoracic doses of AD 32 of 600 mg/m² (given as 100 mg/kg) killed 6 of 10 female rats but an identical volume of vehicle control killed 4 of 10. A single intrathoracic dose of 30 mg/kg killed one of four beagle dogs. In both the intravesical and intrathoracic studies the vehicle, NCI Diluent 12, was dose limiting.

Three or six doses of AD 32 instilled in the urinary bladder of rats to 324 mg/m², seven days apart, caused only limited toxicity. The trauma and damage in the peritoneum, bladder and urethra were probably caused by the procedure. Six intravesical doses of AD 32 in the urinary bladder of male dogs to 400 mg caused neovascularization and the accumulation of pigment laden macrophages in the bladder epithelium. Treatment also caused atrophy and inflammation of the prostate, and testicular degeneration. Some of this damage remained after 35 days of recovery. Unfortunately the experiment did not include sufficient information about the vehicle controls, so I cannot distinguish AD 32 toxicity from vehicle toxicity (NCI Diluent 12).

Three IP doses to 636 mg/m² given 14 days apart to rats caused no mortality and only a 33% decrease in WBC. The doses in this study were among the highest systemic doses given to rats or dogs. The study suggests that myelosuppression is dose limiting, but the high dose was relatively low. Three IP doses to 600 mg/m² given 21 days apart to rats also caused no mortality. Nevertheless, this longer schedule did cause edema and degeneration of the sciatic nerve that increased in intensity with dose. This neuropathy is possibly associated with a

diminished blood-neural-barrier in the lumbosacral area of rats. The significance of this toxicity to humans is questionable. In this study, IP dosing caused damage to the testes even at 480 mg/m².

In beagle dogs, three IP doses to 400 mg/m² given 21 days apart caused only mild degeneration in the seminiferous tubules and some degeneration in the liver. These toxicities are not unusual for an anthracycline. The dose approximates the proposed human dose which is relatively low.

Repeated intrathoracic dosing in rats to 600 mg/m² caused the death of 20 of 20 animals. Half this dose was lethal to 14 of 20 animals. In this experiment, vehicle at the volume given to high dose animals caused the death of four of 20 animals. Death appeared to be caused by pulmonary effusion. In surviving animals dosing caused prolonged lymphopenia, adhesions, pericarditis, fibrinous pleuritis and gross changes in the liver and spleen. Three intrathoracic doses of 400 mg/m² given 21 days apart killed two of four dogs. Surviving animals suffered weight loss, an inflammatory response after dosing. Local toxicities included thoracic effusions, fibrin deposition and adhesions. Treatment with AD 32 by this route is probably too toxic to be a practical therapy.

Long term IV dosing with AD 32 appears to cause a different spectrum of toxicities than Dox. A total dose of 60.7 mg (0.11 mmoles) of Dox over 12 weeks caused cardiac edema, ventricular dilation, myocytolysis, fibrosis and atrophy in rabbits. This cumulative dose of Dox also caused direct damage to the glomerulus in the kidneys, centrilobular necrosis in the liver and aspermia and testicular degeneration. A dose cumulative dose 492.1 mg of AD 32 (0.68 mmoles) over the same period caused only moderate cardiac edema and vacuolization in rabbits. In this study AD 32 also caused enlargement of the spleen, bone marrow hypoplasia and fatty changes in the liver. The splenic enlargement was associated with sinusoids filled with erythrocytes and granulocytes at various stages of maturity.

In humans, the dose limiting toxicity for IV AD 32 is myelosuppression. When the drug is instilled in the urinary bladder of humans, irritation from the vehicle (ethanol) is dose limiting at 900 mg.

AD 32 caused increases in the number of bacterial revertants as high as 17 fold above control in two strains of Salmonella and one strain of E. coli without S9 activation. With S9, AD 32 caused increases in the number of revertants as high as 53 fold. The strains that were sensitive all contained the pKM101 plasmid suggesting that AD 32 causes mutations involving error prone repair. In *in vitro* chromosomal aberration assays, AD 32 caused even more chromosomal damage than the positive control, mitomycin C, without S9. At the higher concentrations the incidence of damage was more than 300 fold greater than control. Adding S9 did not significantly increase this damage. Clearly, AD 32 is mutagenic.

In a study of reproductive toxicity, AD 32 caused significant decreases in litter size and early resorption (7 fold increase) at doses that only caused a 10% weight reduction in dams (72 mg/m² or approximately one sixth the proposed clinical dose). A dose of 18 mg/m² also caused some weight loss in the dams, so it was not a NOAEL. Doses of 36 and 72 mg/m² caused significant dose dependent fetal malformations and variations. These included, but were not limited to, microphthalmia, short snout (with attendant skeletal alterations), meningocele, cleft palate, protrusion of the tongue, dilation of the ventricles of the brain, fused ribs, alterations of the vertebra, and delayed or incomplete ossification. AD 32 causes embryo and fetal death and is teratogenic.

In monkeys the elimination of AD 32 from serum appears biphasic. The half-lives are 7 minutes and 3.8 hours. This compares to half-lives of 2.7 minutes and 12.5 minutes for Dox. After 24 hours, 30.4% of a given dose was eliminated in the bile primarily as AD 41 and AD 92. Monkeys eliminated 11% of a given dose in the urine. These results imply that AD 32

metabolites maintain relatively long residence in the body, and particularly the hepatobiliary system.

AD 32 is not a simple prodrug of Dox. Its major metabolite AD 41, is cytotoxic and has considerable anti-tumor activity. In humans, a single dose of AD 32 is rapidly cleared from the serum and most of it is rapidly converted to AD 41 and AD 92. Cytochrome P540 dependent metabolism is not a major factor in the elimination of AD 32. Urinary excretion of anthracyclines is between 4 and 9% of the total dose. As with most species studied, humans eliminate most of a given dose in the bile.

The systemic MTD of AD 32 in humans is approximately 900 mg/m². Most clinical protocols used a dose of 600 mg/m². The proposed clinical dose in this NDA is significantly less than these doses on a mg/m² basis. Thus, even if the entire dose entered the peritoneum by accident the procedure should not cause unmanageable toxicity.

Recommendation:

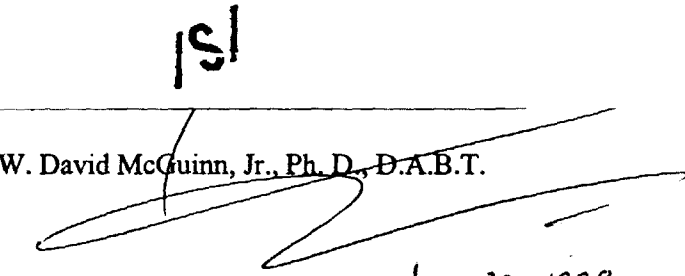
None of the preclinical information submitted in this NDA precludes approval of AD 32 for the proposed indication. These studies may proceed based on previous clinical and preclinical data.

NDA Status:

The oncology advisory committee voted not to approve this NDA because the clinical trials failed to establish efficacy.

Labeling Review:

The proposed label conforms to CFR 201.5.7. Editing will be needed should this drug be approved.


W. David McGuinn, Jr., Ph.D., D.A.B.T.

June 22, 1998

cc: Original IND
/HFD-150
/P Andrews
/A Staten
/WD McGuinn

6/23/98

NDA 20-671

Account of Histopathology samples

Study Species		AD332RAT		
		3-E64 Dogs	048-004 Rat	CHSTX4 Rat
Adrenals				X
	Cortex	X		
	Medulla	X		
Aorta		X		X
Bone				
Bone Marrow smear		X	X	
Brain		X		X
Brain Stem		X		
Cecum		X		
Cerebellum		X		
Cerebrum		X		
Cervix				
Chest wall				
	Right			X
	left			X
Colon		X		X
Diaphragm				X
Duodenum		X		X
Epididymis		X		X
Esophagus		X		X
Eye		X		X
Falopian tube				
Femur				
Foot			X	
Gall bladder		X		
Hind Limb			X	
Heart		X	X	X
Harderian gland				
Ileum		X		
Injection site				
Jejunum		X		X
Kidneys		X	X	X
Lachrymal gland				
Large Intestine			X	
Lymph node		X	X	
Liver		X	X	X
Lungs		X	X	
Apical & diaphragmatic lobes right				X
Apical & diaphragmatic lobes right				X
Macroscopic lesions				
Mammary Gland		X		
Mesenteric lymph glands		X		
Ovaries			X	X
Pancreas		X		

Histo

Parathyroid	X		
Paricardium			
Peripheral nerve			X
Pituitary	X		
Prostate	X		
Rectum	X		
Salivary gland	X		
Sciatic nerve		X	X
Seminal vesicle			
Skeletal muscle			
Skin	X		X
Small Intestine		X	
Spinal cord	X		
Spleen	X	X	
Sternum	X		
Stomach	X		
Testes	X		X
Thymus	X	X	X
Thyroid	X		X
Tongue			
Trachea	X		X
Urinary bladder	X		X
Uterus			X
Vagina			
Injection Site	X		
tissue masses	X		
gross lesions	X	X	

Comprehensive List of studies submitted to NDA 20-894

See the review of this NDA for a list of the studies among these reviewed for the determination of approval.

APPENDIX A Individual Nonclinical Pharmacology Study Reports

- A.1 Report NSC 246131. Adriamycin cardiotoxicity. A comparison with adriamycin, AD-32 N-trifluoroacetyladiamycin-14-valerate, 1979. SUBMITTED TO IND
- A.2 Report. Sweatman TW. N-trifluoroacetyladiamycin-14-valerate (AD 32): Drug penetration of the dog urinary bladder following intravesical instillation, 1992. Vol 1.12, p 218
- A.3 Report. Swaminathan, S. Cytotoxicity of AD 32 in human bladder cancer cell lines. 1997. Vol. 1.12, p 228

APPENDIX B Individual Toxicology Study Reports

B.1 Acute Toxicity Studies

- B.1.1 Report WIL-178001. Acute study in female albino rats with AD 32 administered by urinary bladder catheterization, 1991. SUBMITTED TO IND
- B.1.2 Report WIL-178002. Acute intraperitoneal toxicity study in female albino rats with AD 32, 1991. SUBMITTED TO IND
- B.1.3 Report AD32RATCHSTX1. A single dose toxicity study of AD 32 injected directly into the thoracic cavity of rats, 1996. SUBMITTED TO IND
- B.1.4 Report AD32CHSTX1. A single dose toxicity study of AD 32 injected directly into the thoracic cavity of beagle dogs, 1995. SUBMITTED TO IND
- B.1.5 Report AD32PROSX1. A single dose toxicity study of AD 32 injected directly into the prostate of beagle dogs, 1995. SUBMITTED TO IND

B.2 Repeat-Dose Toxicity Studies

- B.2.1 Report WIL-178004. Repeated exposure (3 dose) study in female albino rats with AD 32 administered by urinary bladder catheterization, 1991. SUBMITTED TO IND
- B.2.2 Report WIL-178005. Repeated exposure (6 dose) study in female albino rats with AD 32 administered by urinary bladder catheterization, 1991. SUBMITTED TO IND
- B.2.3 Report 3-E64. A repeated dose toxicity study of AD 32 administered intravesicularly to beagle dogs, 1997. SUBMITTED TO IND
- B.2.4 Report OLI-RA247.06-9710-MJV-1, Thunberg AL. Summary report on the analysis of dosing solutions from toxicology study 3-E64
A repeated dose toxicity study of AD 32 administered intravesicularly to beagle dogs, 1997. Vol. 1.19, p 462
- B.2.5 Report WIL-178003. Repeated exposure intraperitoneal toxicity study in female albino rats with AD 32, 1991. SUBMITTED TO IND
- B.2.6 Report 048-004. Repeated dose toxicity study of AD-32 administered intraperitoneally to Sprague-Dawley rats, 1997. SUBMITTED TO IND

- B.2.7 Report OLI-RA247.06-9710-MJV-2, Thunberg AL. Summary report on the analysis of dosing solutions from toxicology study 048-004 Repeated dose toxicity study of AD 32 administered intraperitoneally to Sprague-Dawley rats, 1997. Vol. 1.20, p 484
- B.2.8 Report 048-003. Repeated dose toxicity study of AD 32 administered intraperitoneally to beagle dogs, 1997. SUBMITTED TO IND
- B.2.9 Report OLI-RA247.06-9710-NTJ-1, Thunberg AL. Summary report on the analysis of dosing solutions from toxicology study 048-003 Repeated dose toxicity study of AD 32 administered intraperitoneally to beagle dogs, 1997. Vol. 1.21, p 179
- B.2.10 Report AD32RATCHSTX4. A multiple dose toxicity study of AD 32 injected directly into the thoracic cavity of rats, 1997. - SUBMITTED TO IND
- B.2.11 Report AD32CHSTX4. A multiple dose(X4) toxicity study of AD 32 injected directly into the thoracic cavity of beagle dogs, 1996. SUBMITTED TO IND

B.3 Special Toxicity Studies

- B.3.1 Report 048-001. Eye irritation study of AD 32 in New Zealand white (NZW) rabbits, 1996. SUBMITTED TO IND
- B.3.2 Report 048-002. Primary dermal irritation study of AD 32 in New Zealand white (NZW) rabbits, 1996. SUBMITTED TO IND

B.4 Mutagenicity Studies

- B.4.1 Report 3-D22. Evaluation of AD 32 in the Ames Assay With E. Coli, 1996. SUBMITTED TO IND
- B.4.2 Report 3-D23. Evaluation of AD 32 in the in vitro chromosomal aberration assay, 1997. SUBMITTED TO IND

B.5 Non-GLP Supplemental Toxicity Studies

- B.5.1 Report NSC246131. Adriamycin cardiotoxicity. A comparison with adriamycin, AD-32 N-trifluoroacetyladiamycin-14-valerate, 1979. SUBMITTED TO IND
- B.5.2 Report. Israel M, Sweatman TW and Parker RM. Histopathologic evaluation of rat bladder urothelium at 28 days post-intravesical instillation of NCI Diluent 12 vehicle and AD 32 formulated in NCI Diluent 12 vehicle, 1990. SUBMITTED TO IND

Appendix C Pharmacokinetic Study Reports

- C.1 Report NIH-NO1-CM23242. Garattini S. Relationship of antineoplastic drug kinetics to in vivo effects, 1997. SUBMITTED TO IND
- C.2 Report. Israel M and Khetarpal VK. Comparative tissue distribution and metabolism studies with adriamycin and N-trifluoroacetyladiamycin-14-valerate (AD 32) in normal and tumor-bearing mice, 1991. SUBMITTED TO IND
- C.3 Report. Sweatman TW and Israel M. Pharmacology of intraperitoneal AD 32 in the rat, 1991. SUBMITTED TO IND
- C.4 Report. Sweatman TW. N-trifluoroacetyladiamycin-14-valerate (AD 32): drug penetration of the dog urinary bladder following intravesical administration, 1992. Vol. 1.24, p 380

- C.5 Report. Sweatman TW. and Israel M. Validation report of the liquid chromatography assay for N-trifluoro-acetyl Adriamycin-14-valerate (AD 32) and principal biotransformation products in human serum, 1997. Vol. 1.24, p 390
- C.6 Report. OLI-VRA595.1. Validation of a method for analysis of AD 32, AD 41 and AD 92 in human serum using following protein precipitation, 1997. Vol. 1.25, p 001
- C.7 Report OLI-VRA595.2. Cross-validation of a method for analysis of AD 32, AD 41 and AD 92 in human serum to dog plasma, 1997. Vol. 1.25, p 092
- C.8 Report OLI-RA595-9708-RAW-1. Analysis of AD 32, AD 41 and AD 92 in beagle dog plasma samples from Study 048-003, 1997. Vol. 1.25, p 238
- C.9 Report OLI-RA595-9708-RAW-2. Analysis of AD 32, AD 41 and AD 92 in beagle dog plasma samples from Study 3-E64, 1997. Vol. 1.25, p 270

Appendix D Reference for Non-clinical

Studies 1.26001

Appendix E Individual AD 32 Published References, Vol. 1.26, p 017

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